

ATTACHMENT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CATHERINE GAUJACQ

Plaintiff,

V

No. 1:05CV0969 (JGP)

ELECTRICITE DE FRANCE
INTERNATIONAL NORTH AMERICA,
INC., et al

Defendants

**PLAINTIFF'S FOURTH REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT ELECTRICITE DE FRANCE
INTERNATIONAL NORTH AMERICA, INC. ("EDFINA")**

Plaintiff Catherine Gaujacq, by counsel, requests that defendant Electricite de France International North America, Inc , produce, pursuant to Fed. R. Civ. P. 34, the following documents, and serve defendant's response upon plaintiff's counsel at Charlson Bredehoft & Cohen, P.C., 11260 Roger Bacon Drive, Suite 201, Reston, Virginia 20190, within the time provided by law

DEFINITIONS AND INSTRUCTIONS

In responding to these Requests, the following definitions and instructions shall apply:

1. "Ms Gaujacq" or "Gaujacq" refers to plaintiff Catherine Gaujacq "You," "your" or "EDFINA" refers to defendant Electricite de France International North America, Inc EDFINA, Inc , its agents, officers, and employees, and their subsidiaries, affiliates, and associated corporations, partnerships, and entities "EDF" refers to defendant Electricite de France ("EDF") "the Company" refers collectively to EDF and EDFINA "Nadal" or "Mr Nadal" refers to defendant Christian Nadal "Defendants" refers collectively to all three defendants

2 "This action" refers to this civil action now pending in the United States District Court for the District of Columbia

3 The term "document" is used in the broadest possible sense, and includes (but is not limited to) any written, printed, typed, photocopied, photographed, recorded (including but not limited to magnetic, mechanical, or electronic recordings) or otherwise reproduced communication or representation. This definition includes (but is not limited to) correspondence, memoranda, wires, cables, studies, maps, analyses, diagrams, electronic mail, scraps of paper, notes, loan documentation, applications, drawings, charts, graphs, plans, plats, photographs, video tapes, audio tapes, computer disks, hard drives, contracts, agreements, working papers, drafts, reports of investigations or inspections of any kind, opinions of consultants or experts, diaries, minutes, calendars, other reports, vouchers, invoices, journals, bills, orders, time slips or records, books, computations, field notes, logs, financial records or statements, or work papers, checks, receipts, bank statements and the like. Data compilations from which information may be translated into usable form (e.g., computer memory) are also included. The definition includes, as a separate document, each duplicate or reproduction or copy of a document that contains any non-conforming note, marking, material or attachment. If it is maintained that any document requested to be identified has been destroyed or is otherwise no longer within your possession or control, identify the document and state the date, place, and manner of its destruction or removal from your control, and identify the person who authorized or ordered such destruction or removal.

4 "Person" includes individuals, agencies, government entities, corporations, partnerships, unincorporated associations, and other business entities, and specifically includes the plaintiff and defendant in this action, and includes any predecessors or successors in interest

5 The terms "identity," or "identify," or "describe," or "detail," when used in connection with a document mean to describe the document fully, including the character of the document, its title (if any), date, author(s), addressee(s), recipient(s), number of pages, the location and custodian of each copy to the extent known, the substance of the contents thereof, and any other identifying number or information. The terms "identity," or "identify," or "describe," or "detail" when used in connection with an event or condition mean to indicate, as completely and fully as possible, all facts comprising or contributing to the event or condition. The terms "identity," or "identify," or "describe," or "detail" when used in connection with a person mean:

- a where the person is an individual, to state the person's full name, home and business addresses and telephone numbers, and business or other affiliation (including title), and
- b where the person is not an individual, to state the full name of the entity, the nature of the entity, address and telephone number of the entity, and such additional identifying information as may be necessary to enable the "person" to be contacted. When identifying a "person," information should in all cases be adequate to permit service of process or notice of a deposition upon such person.

6 The terms "relating to," "regarding," and "referring to" shall be interpreted broadly, including both explicit and implicit reference and meaning (without limitation) relating to, regarding, referring to, constituting, defining, discussing, containing, construing, embodying, reflecting, stating, dealing with, prepared in contemplation of, prepared in connection with, prepared as a result of, or in any way pertaining to.

7 Use of the singular tense shall be deemed to include the plural and vice versa. Use of either the masculine or feminine pronoun shall be deemed to include both genders. "And" as well as "or" shall be construed either disjunctively or conjunctively so as to permit the inclusion of materials or information otherwise excluded.

8 In responding to these Requests, please furnish all information available to you or within your control, including any information in the possession of agents, attorneys, contractors, subcontractors, former employees, officers, members, or any other person acting on your behalf.

9 Each Request shall be deemed continuing so as to require supplemental answers in accordance with the Rule 26(e) of the Federal Rules of Civil Procedure.

10 In responding to each Request, please identify all contributing sources of information, including the identity of any person consulted or document used in connection with answering such interrogatory and the extent of any person's assistance.

11 If a privilege or privileges are asserted as to any information requested by these Requests, or if any Request is otherwise not fully answered, please respond to the extent the Request is not objected to, and state the specific grounds for not fully answering, the legal basis for not fully answering (specifying any privilege asserted), and the facts allegedly giving rise to any claim of privilege. Identify any information, document, or other material for which any privilege is asserted, and identify the date and author or generator as well as all persons shown as having been, or otherwise known to you as having been, recipients of such information, document, or other material. If you contend that you have attempted to procure the waiver of the privilege, please also identify fully the persons with whom you communicated and the stated reason for refusal to waive the privilege.

12 Where there is no time limit specified, the Requests encompass documents in existence and/or events occurring during the time period from August 1, 2000 through the present

13 The spelling of all proper nouns in these Requests should be interpreted phonetically, and not necessarily as the nouns are spelled in the Requests

REQUESTS FOR PRODUCTION OF DOCUMENTS

1 For the time period of January 2000 to the present, please provide documents related to the rank, pay, gender, performance history, professional qualifications and background and current position of all employees with the same rank as Ms. Gaujacq (R3) and all employees with the same rank as Mr. Nadal (R1)

2 For the time period of January 2000 to the present, please provide documents related to the rank, pay, gender, performance history, professional qualifications and background and current position of all employees with the same rank as the minimum rank purportedly assigned to whomever holds the position of President of EDFINA (R2).

3 For the time period of 1990 to present, please provide documents reflecting the rank, pay and professional qualifications of each EDF employee that served as president of EDFINA

4 For the time period of 1990 to present, please provide documents regarding all individual who have held the position of President of EDFINA, including each individual's resumes, the position each individual held after his appointment as President of EDFINA, and copies of the Expatriation Contracts for each

5 For the time period of 2000 to 2005, please provide documents reflecting all expenses paid by EDFINA or EDF on behalf of Catherine Gaujacq

6. For the time period of 2000 to 2003, please provide documents reflecting the salary paid by EDF to Catherine Gaujacq, including all W-2s issued by EDF and/or EDFINA regarding Ms. Gaujacq

7 For time period of 2000 to present, please provide documents related to any and all EDF Pension Plan(s) and/or Capital Account Plan

8 For time period of 2000 to present, please provide documents related to any and all EDF and/or EDFINA Preferred Stock Offering or Plan

9 Please provide general memorandum from the taxes counsel of EDF (“une note generale d’information etablie par le Service Fiscal de la Direction Financiere d’EDF”) referenced in Article 14 of Ms. Gaujacq’s Expatriation Contract

10 Please provide documents regarding Francoies Denni, including any complaints by or about him and any judgment of rights regarding him

11. For the time period of 1999 to 2005, please provide documents sufficient to show the dates and names of each person having check-signing authority for EDFINA in the United States

12 Please provide documents showing procedures and policies regarding the giving of promotions and/or raises or bonuses for all EDF and/or EDFINA employees

13. Please provide documents reflecting any comparisons made between Ms. Gaujacq and any other EDF or EDFINA employee other than Mr. Nadal

14 For the time period of 2003 to present, please produce documents relating to all complaints, formal and informal, made by any employee of EDF and/or EDFINA respecting gender discrimination or retaliation because of complaining of discrimination, any investigation, the results of any such investigation, any action taken, any follow-up by EDF and/or EDFINA

relating to the complaining employee or the subject of the complaint, and the current employment status (including position held) of the complaining employee and the subject of the complaint.

15 For the time period of 2004 to present, please produce all EEO-1 documents submitted to the EEOC or any other agency.

16 Please produce documents reflecting any comparison between treatment of female and non-female employees of EDF and/or EDFINA, including any documents that would support a claim that EDF and/or EDFINA does not discriminate on the basis of gender and any documents that would support a claim that EDF and/or EDFINA does discriminate on the basis of gender.

17 Please produce all documents reflecting the identity of and level of participation of any EDF and/or EDFINA employee who acted upon, made decisions regarding, or gave opinions related to any of Ms. Gaujacq's complaints of discrimination and/or retaliation from 2004 to present.

18 Please produce all documents regarding the performance evaluations of Benoit Dreux from January 2000 to the present.

19 Please produce all documents regarding the performance evaluations of Jean-Luc Foret from January 2000 to the present.

20 Please produce all documents regarding the performance evaluations of Richard Schomberg from January 2000 to the present.

21 Please produce all documents regarding the performance evaluations of Adja Ba from January 2000 to the present.

22 Please produce the 941's and 942's for EDF and EDFINA for 2002- 2005.

23. Please produce all documents regarding any valuation of the laptop used by Ms Gaujacq during her tenure as President of EDFINA, the original cost of the laptop, appreciation or depreciation, cost analysis, and the offer or offers to sell the laptop to Ms. Gaujacq.

24. Please produce all documents regarding EDF's and/or EDFINA's policies for clearing data from laptops

25. Please produce all documents regarding Mr. Nadal's contract or contracts relating to his mission, job, and/or position and compensation in Argentina Edenor from 2000 – 2002

26. Please produce all documents regarding Mr. Nadal's contract or contracts relating to his mission, job, and/or positions, and compensation from 2002 and 2003

27. Please produce all documents regarding the audit(s) conducted of Mr. Nadal's division of EDF in 1992.

28. Please produce all documents regarding the audit(s) conducted of Mr. Nadal's division of EDF in 1993 and 1994 while Mr. Nadal was an Executive Vice President

29. Please produce all documents regarding the audit(s) conducted of the Development position at EDF in 1997 while Mr. Nadal was Vice President of Strategy and Development

30. Please produce all documents regarding the audit(s) conducted of Edenor in 2000 and 2001

32. Please produce all documents constituting or interpreting EDF's Guide for Expatriation Missions

33. Please produce all Expatriation Contracts (or other contracts) of Richard Schomberg from 2000 to the present.

34 Please produce all Expatriation Contracts (or other contracts) of Benoit Dreux from 2000 to the present

35 Please produce all Expatriation Contracts (or other contracts) of Jean-Luc Foret from 2000 to the present

36 Please produce all documents (including disks) reflecting the results (including all documents obtained) of any and all searches, image scans, or other devices used or employed on any computer used by Catherine Gaujacq, including specifically her laptop and desk computers

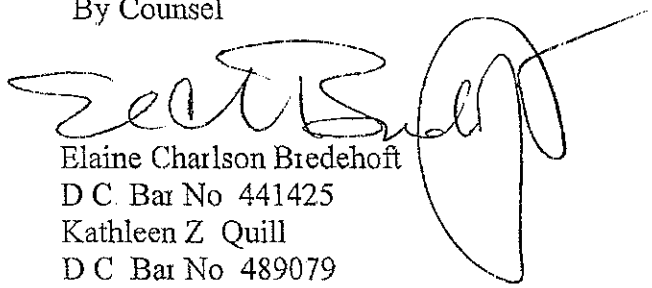
37 Please produce all documents relating to the position or positions offered to Catherine Gaujacq in 2004.

38 Please produce all documents related to Mr Virleux including Mr Virleux's qualifications, work history, compensation, current position, level ratings, mission, job responsibilities, and all contracts with Mr Virleux of any nature

39 Please produce all documents sufficient to reflect all commercial projects worked on by EDFINA from 2000 to the present

April 7, 2006

Catherine Gaujacq,
By Counsel



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D C. Bar No 441425
Kathleen Z Quill
D C Bar No 489079
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Counsel for Plaintiff,
Catherine L Gaujacq

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PLAINTIFF'S FOURTH REQUEST FOR THE PRODUCTION OF DOCUMENTS TO DEFENDANT EDFINA by email, this 7th day of April, 2006, addressed to counsel defendant EDFINA as follows:

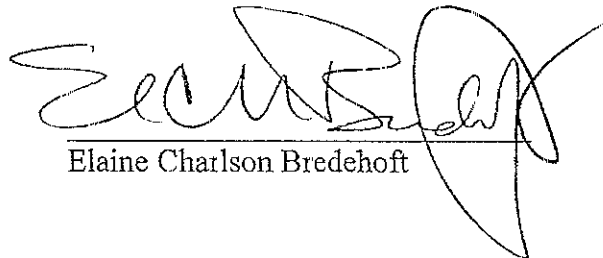
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Electricite de France International North America

With a courtesy copy served this same day by email delivery, addressed as follows:

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